

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Structure and Practices of the Video Relay Service Program	)	G.G. Docket No. 10-51
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	G.G. Docket No. 03-123
	)	
	)	

**National Association of the Deaf;  
Telecommunications for the Deaf and Hard of Hearing, Inc.;  
Hearing Loss Association of America;  
American Association of the Deaf-Blind;  
Deaf and Hard of Hearing Consumer Advocacy Network; and  
California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc..**

**COMMENTS IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

The National Association of the Deaf (“NAD”), Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), Hearing Loss Association of America (“HLAA”), American Association of the Deaf-Blind (“AADB”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), and California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”) (collectively, the “Consumer Groups”), submit these Comments in response to the Notice of Proposed Rulemaking (“NPRM”) issued by the Consumer & Governmental Affairs Bureau (“Bureau”) of the Federal Communications Commission (“FCC” or “Commission”) requesting interested parties to comment on the rates and compensation for video relay service (VRS) for the 2011-12 Interstate Telecommunications Relay Services (“TRS”) Fund (“Fund”) year.

## **VRS RATES AND COMPENSATION**

Upon determining the rates and compensation for VRS for the 2011-2012 year, the Consumer Groups strongly encourage the Commission to keep the goal of functional equivalency at the forefront and equal access the highest priority. Functional equivalency is required by law and the rates and compensation should be determined in a manner that best ensures functional equivalency for Americans who are deaf, hard of hearing, late-deafened, and deaf-blind. One of the principles of functional equivalency is to encourage innovation of new technology and products. This innovation plays an important role in closing any and all technological gaps in the rapid and ongoing changing environment in telecommunications arena so as to ensure equality for deaf, hard of hearing, late-deafened, and deaf-blind is always on par with our hearing peers. This innovation plays an important role in closing the gap in order to achieve functional equivalency in calls.

We, the Consumer Groups, submitted our TRS Policy Statement to the Commission on April 12, 2011, which includes our definition of functional equivalency and our core functional equivalency principles for TRS<sup>1</sup>. We encourage the Commission to use this definition and these principles in determining the VRS rates and compensation for 2011-2012.

---

<sup>1</sup> Filed April 12, 2011 by Telecommunications for the Deaf and Hard of Hearing, Inc., et al, Docket Numbers 03-123 and 10-51.

Respectfully submitted,



Andrew S. Phillips, J.D.  
Law and Advocacy Center  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Claude L. Stout  
Executive Director  
Telecommunications for the  
Deaf and Hard of Hearing, Inc.  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer  
Advocacy Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22010

Brenda Battat  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Sheri A. Farinha  
Vice Chair  
California Coalition of Agencies Serving  
the Deaf and Hard of Hearing, Inc.  
4708 Roseville Rd, Ste 111  
North Highlands, CA 95660

Randall Pope  
Interim Executive Director  
American Association of the Deaf-Blind  
8630 Fenton Street, Suite 121  
Silver Spring, MD 20910

Dated: May 16, 2011